

1 RENE L. VALLADARES  
Federal Public Defender  
2 State Bar No. 11479  
REBECCA LEVY  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702)388-6261/Fax  
rebecca\_levy@fd.org  
6

7 Attorney for ANTOINE LEVLEE LAUSHAUL  
8

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ANTOINE LEVLEE LAUSHAUL,

15 Defendant,  
16

Case No. 2:17-cr-00265-JCM-PAL

**EMERGENCY UNOPPOSED MOTION TO  
MODIFY CONDITIONS OF RELEASE**

17 The Defendant, Antoine Laushaul, through his attorney, Rene L. Valladares, Federal Public  
18 Defender, and Rebecca Levy, Assistant Federal Public Defender, respectfully moves this Honorable  
19 Court to modify condition of his release to allow him to travel to California on two occasions.  
20

21 DATED this February 1, 2018

22 RENE L. VALLADARES  
Federal Public Defender  
23

24 By /s/ Rebecca Levy  
REBECCA LEVY  
25 Assistant Federal Public Defender  
26 Attorney for Antoine Laushaul  
27  
28

1 **ARGUMENT**

2 On August 16, 2017, the grand jury in the District of Nevada returned a two-count indictment  
3 against Mr. Laushaul for Distribution of a Controlled Substance and Conspiracy to Distribute (the  
4 “Indictment”) Docket #1. On January 8, 2018, Mr. Laushaul was released on his personal recognizance  
5 with many conditions of release. One of those conditions is that his travel is restricted to Clark County,  
6 NV. On Friday, January 26, 2018, Mr. Laushaul’s brother passed away in California. Mr. Laushaul is  
7 seeking to go to California from February 2, 2018 until February 4, 2018 to assist in a fundraiser being  
8 put on for his brother’s funeral expenses. Mr. Laushaul is seeking to go back to California from  
9 February 9, 2018 until February 11, 2018 for his brother’s funeral. The funeral will be held at Alan  
10 Chapel in Compton, CA. While Mr. Laushaul is in California, he will stay with his mother, Stephanie  
11 Hawkins. She resides in Palmdale, CA and the address will be provided to Pre-Trial Services.

12 Pre-Trial Officer Emily McKillip does not oppose this request. Further, the government does  
13 not oppose this request.

14 **CONCLUSION**

15 Accordingly, we are respectfully requesting this modification of the conditions of Mr.  
16 Laushaul’s release to allow him to travel to California for two separate weekends after the passing of  
17 his brother.


18  
19 Respectfully Submitted, this February 1, 2018

20  
21 RENE L. VALLADARES  
Federal Public Defender

22  
23 By /s/ Rebecca Levy  
REBECCA LEVY  
Assistant Federal Public Defender  
Attorney for Antoine Laushaul

24  
25 **IT IS SO ORDERED.**

26 Dated this 1st day of February, 2018.

27   
28 PEGGY A. LEEN  
UNITED STATES MAGISTRATE JUDGE